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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RUSSELL KUEH,

Plaintiff,

vs.

JIA LUN SHAO a/k/a ANDY SHAO

and

JINGYUN WANG a/k/a VIVIAN WANG,

Defendants.

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**ANSWER TO PLAINTIFF'S
FIRST AMENDED COMPLAINT**

Case Action No: 2:24-cv-09972

Defendant Jia Lun Shao a/k/a Andy Shao (herein "Shao") says by way of Answer to Plaintiff's, Russell Kueh's, (herein "Plaintiff") First Amended Complaint (herein "FAC") as follows:

PRELIMINARY STATEMENT

1. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph one (1) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

2. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two (2) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

3. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph three (3) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

4. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph four (4) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

5. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph five (5) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

6. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph six (6) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

7. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph seven (7) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

8. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eight (8) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

9. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph nine (9) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

10. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph ten (10) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

11. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eleven (11) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

12. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twelve (2) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

13. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph thirteen (13) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

14. Shao admits only that Jingyun Wang a/k/a Vivian Wang (herein "Wang") is his spouse. Shao is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph fourteen (14) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

15. Shao admits only the first sentence of paragraph fifteen (15) with regard to Wang's employment. Shao is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph fifteen (15) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

16. Shao admits only the first sentence of paragraph sixteen (16) with regard to his employment. Shao denies the remaining allegations contained in paragraph sixteen (16) of Plaintiff's FAC.

17. Shao admits the first sentence of paragraph seventeen (17) with regard to Wang's relocation. Shao denies the remaining allegations contained in paragraph seventeen (17) of Plaintiff's FAC.

18. Shao denies the allegations contained in paragraph eighteen (18) of the FAC.

19. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph nineteen (19) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

20. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty (20) and so leaves Plaintiff to his proofs.

21. Shao denies the allegations contained in paragraph twenty-one (21) of Plaintiff's FAC.

22. Shao denies the allegations contained in paragraph twenty-two (22) of Plaintiff's FAC.

23. Shao denies the allegations contained in paragraph twenty-three (23) of Plaintiff's FAC.

24. Shao denies the allegations contained in paragraph twenty-four (24) of Plaintiff's FAC.

25. Shao denies the allegations contained in paragraph twenty-five (25) of Plaintiff's FAC.

26. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-six (26) of the FAC and so leaves Plaintiff to his proofs.

27. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-seven (27) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

JURISDICTION AND VENUE

28. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-eight (28) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

29. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-nine (29) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

30. Shao admits only that he is a resident of New Jersey. Shao denies the remaining allegations contained in paragraph thirty (30) of Plaintiff's FAC.

31. Shao admits only that Wang is a resident of New Jersey. Shao denies the remaining allegations contained in paragraph thirty-one (31) of Plaintiff's FAC.

32. Shao admits only that email address Lucy116503@gmail.com referenced in subpart b of paragraph thirty-two (32) is his. Shao denies the remaining allegations contained in paragraph thirty-two of Plaintiff's FAC.

33. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-three (33) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

34. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-four (34) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

FACTUAL ALLEGATIONS

**Vivian Jingyun Wang Meets and Begins Acting
Inappropriately Toward Plaintiff**

35. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-five (35) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

36. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-six (36) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

37. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-seven (37) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

38. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-eight (38) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

39. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-nine (39) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

40. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty (40) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

41. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-one (41) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

42. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-two (42) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

43. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-three (43) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

44. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-four (44) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

45. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-five (45) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

In September 2023, Vivian Jingyun Wang Requested Plaintiff Represent Her at the Annual Performance Roundtable

46. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-six (46) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

47. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-seven (47) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

48. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-eight (48) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

49. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-nine (49) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

50. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph fifty (50) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

51. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-one (51) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

52. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-two (52) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

53. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-three (53) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

54. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-four (54) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

Vivian Jingyun Wang Inappropriately Accessed Her Rating Outcome in October 2023 and Blamed Plaintiff for What She Considered a "Disappointingly Fair" Result

55. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-five (55) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

56. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-six (56) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

57. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-seven (57) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

58. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-eight (58) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

59. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-nine (59) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

Vivian Jingyun Wang Informed Plaintiff in Late-October 2023 of Her Intention to Relocate to the U.S. Office for Her Planned Marriage

60. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty (60) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

61. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-six (61) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

62. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-two (62) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

**Vivian Jingyun Wang Quiet Quit while Awaiting Relocation
and Began Retaliating Against Plaintiff in November 2023**

63. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-three (63) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

64. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-four (64) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

65. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-five (65) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

66. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph sixty-six (66) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

67. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-seven (67) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

68. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-eight (68) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

69. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-nine (69) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

70. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy (70) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

71. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy-one (71) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

72. Shao denies the allegations contained in paragraph seventy-two (72) of Plaintiff's FAC.

Defendants Sent Their First Blast E-Mail on December 20, 2023

73. Shao states that the allegations of paragraph seventy-three (73) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs.

74. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy-four (74) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

75. Shao denies the allegations contained in paragraph seventy-five (75) of Plaintiff's FAC.

Defendants Sent Their Second Blast E-mail on January 4, 2024 and Then a Series of Targeted Harassing E-mails within the Month

76. Shao denies the allegations contained in paragraph seventy-six (76) of Plaintiff's FAC.

77. Shao denies the allegations contained in paragraph seventy-seven (77) of Plaintiff's FAC.

78. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph seventy-eight (78) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

79. Shao states that the allegations of paragraph seventy-nine (79) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs.

80. Shao denies the allegations contained in paragraph eighty (80) of Plaintiff's FAC.

81. Shao states that the allegations of paragraph eighty-one (81) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs.

82. Shao states that the allegations of paragraph eighty-two (82) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

83. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph eighty-three (83) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

84. Shao denies the allegations contained in paragraph eighty-four (84) of Plaintiff's FAC.

85. Shao states that the allegations of paragraph eighty-five (85) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

86. Shao states that the allegations of paragraph eighty-six (86) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

87. Shao states that the allegations of paragraph eighty-seven (87) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

88. Shao states that the allegations of paragraph eighty-eight (88) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

89. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-nine (89) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

90. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph ninety (90) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

**Defendants Sent More Blast E-mails in Late-February 2024
to Desperately Resuscitate Their Failing Scheme**

91. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph ninety-one (91) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

92. Shao denies the allegations contained in paragraph ninety-two (92) of Plaintiff's FAC.

93. Shao states that the allegations of paragraph ninety-three (93) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

94. Shao denies the allegations contained in paragraph ninety-four (94) of Plaintiff's FAC.

95. Shao states that the allegations of paragraph ninety-five (95) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

96. Shao denies the allegations contained in paragraph ninety-six (96) of Plaintiff's FAC.

97. Shao denies the allegations contained in paragraph ninety-seven (97) of Plaintiff's FAC.

98. Shao denies the allegations contained in paragraph ninety-eight (98) of Plaintiff's FAC.

99. Shao states that the allegations of paragraph ninety-nine (99) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief

as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

**Defendants Relentlessly Attacked Those Who Vindicated
Plaintiff until April 2024**

100. Shao denies the allegations contained in paragraph one hundred (100) of Plaintiff's FAC.

101. Shao denies the allegations contained in paragraph one hundred-one (101) of Plaintiff's FAC.

102. Shao denies the allegations contained in paragraph one hundred-two (102) of Plaintiff's FAC.

103. Shao denies the allegations contained in paragraph one hundred-three (103) of Plaintiff's FAC.

104. Shao denies the allegations contained in paragraph one hundred-four (104) of Plaintiff's FAC.

105. Shao denies the allegations contained in paragraph one hundred-five (105) of Plaintiff's FAC.

106. Shao denies the allegations contained in paragraph one hundred-six (106) of Plaintiff's FAC.

**Defendants Initially Attempted to Harass Miss X and
Plaintiff's Girlfriend into Turning Against Plaintiff**

107. Shao denies the allegations contained in paragraph one hundred-seven (107) of Plaintiff's FAC.

108. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-eight (108) of Plaintiff's FAC and so leaves plaintiff to his proofs.

109. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-nine (109) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

110. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-ten (110) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

111. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-eleven (111) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

112. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-twelve (112) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

113. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph one hundred-thirteen (113) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

114. Shao denies the allegations contained in paragraph one hundred-fourteen (114) of Plaintiff's FAC.

115. Shao denies the allegations contained in paragraph one hundred-fifteen (115) of Plaintiff's FAC.

**Defendants Later Retaliated Against
Miss X for Whistleblowing**

116. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-sixteen (116) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

117. Shao denies the allegations contained in paragraph one hundred-seventeen (117) of Plaintiff's FAC.

118. Shao states that the allegations of paragraph one hundred eighteen (118) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

119. Shao states that the allegations of paragraph one hundred nineteen (119) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies

any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

**Defendants Attacked Miss X and Plaintiff out of Shame Rage
After Their Scheme Had Failed**

120. Shao denies the allegations contained in paragraph one hundred-twenty (120) of Plaintiff's FAC.

121. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred twenty-one (121) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

122. Shao denies the allegations contained in paragraph one hundred twenty-two (122) of Plaintiff's FAC.

123. Shao denies the allegations contained in paragraph one hundred twenty-three (123) of Plaintiff's FAC.

124. Shao denies the allegations contained in paragraph one hundred twenty-four (124) of Plaintiff's FAC.

125. Shao denies the allegations contained in paragraph one hundred twenty-five (125) of Plaintiff's FAC.

126. Shao denies the allegations contained in paragraph one hundred twenty-six (126) of Plaintiff's FAC.

127. Shao denies the allegations contained in paragraph one hundred twenty-seven (127) of Plaintiff's FAC.

128. Shao states that the allegations of paragraph one hundred twenty-eight (128) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

129. Shao states that the allegations of paragraph one hundred twenty-nine (129) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

130. Shao states that the allegations of paragraph one hundred thirty (130) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

131. Shao states that the allegations of paragraph one hundred thirty-one (131) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies

any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

132. Shao states that the allegations of paragraph one hundred thirty-two (132) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

133. Shao states that the allegations of paragraph one hundred thirty-three (133) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

134. Shao states that the allegations of paragraph one hundred thirty-four (134) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

**Defendants' Allegations Are Categorically False and
Published with Actual Malice**

135. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred twenty-five (135) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

136. Shao denies the allegations contained in paragraph one hundred thirty-six (136) of Plaintiff's FAC.

137. Shao states that the allegations of paragraph one hundred thirty-seven (137) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

138. Shao states that the allegations of paragraph one hundred thirty-eight (138) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

139. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph one hundred thirty-nine (139) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

140. Shao denies the allegations contained in paragraph one hundred thirty-four (140) of Plaintiff's FAC.

141. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-one (141) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

142. Shao states that the allegations of paragraph one hundred forty-two (142) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

143. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-three (143) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

144. Shao denies the allegations contained in paragraph one hundred thirty-four (144) of Plaintiff's FAC.

145. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-five (145) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

Plaintiff Has Suffered Devastating, Worldwide Harm to His Reputation and Career and Continues to Live in Unease

146. Shao denies the allegations contained in paragraph one hundred forty-six (146) of Plaintiff's FAC.

147. Shao denies the allegations contained in paragraph one hundred thirty-seven (147) of Plaintiff's FAC.

148. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-eight (148) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

149. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-nine (149) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

150. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty (150) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

151. Shao denies the allegations contained in paragraph one hundred fifty-one (151) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

152. Shao denies the allegations contained in paragraph one hundred fifty (152) of Plaintiff's FAC.

153. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph one hundred fifty-three (153) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

154. Shao states that the allegations of paragraph one hundred fifty-four (154) of the FAC seek to characterize a written document that speaks for itself. Shao is without sufficient knowledge or belief as to form an opinion as to such and so denies any allegations to the extent they mischaracterize the written document and so leaves Plaintiff to his proofs. Shao denies any remaining allegations.

155. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty-five (155) of Plaintiff's FAC and so leave Plaintiff to his proofs.

156. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty-six (156) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

157. Shao denies the allegations contained in paragraph one hundred fifty-seven (157) of Plaintiff's FAC.

158. Shao denies the allegations contained in paragraph one hundred fifty-eight (158) of Plaintiff's FAC.

159. Shao denies the allegations contained in paragraph one hundred fifty-nine (159) of Plaintiff's FAC.

160. Shao denies the allegations contained in paragraph one hundred sixty (160) of Plaintiff's FAC.

Defendants' Weaponization of Legal Proceedings

161. Shao admits only that Plaintiff used a pseudonym during the litigation. Shao denies the remaining allegations contained in paragraph one hundred sixty-one (161) of Plaintiff's FAC.

162. Shao denies the allegations contained in paragraph one hundred sixty-two (162) of Plaintiff's FAC.

163. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty-three (163) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

164. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty-four (164) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

FIRST CAUSE OF ACTION
(Defamation)

165. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

166. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty-six (166) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

167. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty-seven (167) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

168. Shao denies the allegations contained in paragraph one hundred sixty-eight (168) of Plaintiff's FAC.

169. Shao denies the allegations contained in paragraph one hundred seventy (170) of Plaintiff's FAC.

171. Shao denies the allegations contained in paragraph one hundred seventy-one (171) of Plaintiff's FAC.

172. Shao denies the allegations contained in paragraph one hundred seventy-two (172) of Plaintiff's FAC.

173. Shao denies the allegations contained in paragraph one hundred seventy-three (173) of Plaintiff's FAC.

174. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-four (174) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

175. Shao denies the allegations contained in paragraph one hundred seventy-five (175) of Plaintiff's FAC.

176. Shao denies the allegations contained in paragraph one hundred seventy-six (176) of Plaintiff's FAC.

177. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

paragraph one hundred seventy-seven (177) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

SECOND CAUSE OF ACTION
(Defamation Per Se)

178. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

179. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-nine (179) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

180. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty (180) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

181. Shao denies the allegations contained in paragraph one hundred eighty-one (181) of Plaintiff's FAC.

182. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty-two (182) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

THIRD CAUSE OF ACTION
(False Light Invasion of Privacy)

183. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

184. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty-four (184) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

185. Shao denies the allegations contained in paragraph one hundred eighty-five (185) of Plaintiff's FAC.

186. Shao denies the allegations contained in paragraph one hundred eighty-six (186) of Plaintiff's FAC.

187. Shao denies the allegations contained in paragraph one hundred eighty-seven (187) of Plaintiff's FAC.

188. Shao denies the allegations contained in paragraph one hundred eighty-eight (188) of Plaintiff's FAC.

189. Shao denies the allegations contained in paragraph one hundred eighty-nine (189) of Plaintiff's FAC.

190. Shao denies the allegations contained in paragraph one hundred ninety (190) of Plaintiff's FAC.

191. Shao denies the truth of the allegations contained in paragraph one hundred ninety-one (191) of Plaintiff's FAC.

192. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-two (192) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

FOURTH CAUSE OF ACTION
(Publicity Given to Private Life)

193. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

194. Shao denies the truth of the allegations contained in paragraph one hundred ninety-four (194) of Plaintiff's FAC.

195. Shao denies the truth of the allegations contained in paragraph one hundred ninety-five (195) of Plaintiff's FAC.

196. Shao denies the allegations contained in paragraph one hundred ninety-six (196) of Plaintiff's FAC.

197. Shao denies the truth of the allegations contained in paragraph one hundred ninety-seven (197) of Plaintiff's FAC.

198. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-eight (198) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

FIFTH CAUSE OF ACTION
(Aiding and Abetting Defamation)

199. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

200. Shao denies the truth of the allegations contained in paragraph two hundred (200) of Plaintiff's FAC.

201. Shao denies the truth of the allegations contained in paragraph two hundred one (201) of Plaintiff's FAC..

202. Shao denies the allegations contained in paragraph two hundred two (202) of Plaintiff's FAC.

203. Shao denies the truth of the allegations contained in paragraph two hundred three (203) of Plaintiff's FAC.

204. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred four (204) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

SIXTH CAUSE OF ACTION
(Tortious Interference with Contract/Prospective Economic Advantage)

205. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

206. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred six (206) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

207. Shao denies the truth of the allegations contained in paragraph two hundred seven (207) of Plaintiff's FAC.

208. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred eight (208) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

209. Shao denies the truth of the allegations contained in paragraph two hundred nine (209) of Plaintiff's FAC.

210. Shao denies the truth of the allegations contained in paragraph two hundred ten (210) of Plaintiff's FAC.

211. Shao denies the allegations contained in paragraph two hundred eleven (211) of Plaintiff's FAC.

212. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred twelve (212) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

213. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred thirteen (213) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

SEVENTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)

214. Shao incorporates by reference his responses to all the preceding paragraphs as if set more fully herein.

215. Shao denies the allegations contained in paragraph two hundred fifteen (215) of Plaintiff's FAC.

216. Shao denies the allegations contained in paragraph two hundred sixteen (216) of Plaintiff's FAC.

217. Shao denies the allegations contained in paragraph two hundred seventeen (217) of Plaintiff's FAC.

218. Shao denies the allegations contained in paragraph two hundred eighteen (218) of Plaintiff's FAC.

219. Shao denies the allegations contained in paragraph two hundred nineteen (219) of Plaintiff's FAC.

220. Shao denies the allegations contained in paragraph two hundred twenty (220) of Plaintiff's FAC.

221. Shao denies the allegations contained in paragraph two hundred twenty-one (221) of Plaintiff's FAC.

222. Shao denies the allegations contained in paragraph two hundred twenty-two (222) of Plaintiff's FAC.

223. Shao denies the allegations contained in paragraph two hundred twenty-three (223) of Plaintiff's FAC.

224. Shao denies the allegations contained in paragraph two hundred twenty-four (224) of Plaintiff's FAC.

225. Shao denies the allegations contained in paragraph two hundred twenty-five (225) of Plaintiff's FAC.

226. Shao denies the allegations contained in paragraph two hundred twenty-six (226) of Plaintiff's FAC.

227. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred twenty-seven (227) of Plaintiff's FAC and so leaves Plaintiff to his proofs.

GENERAL DENIAL

Shao denies each and every allegation set forth in the FAC that is not specifically admitted herein.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

The Court does not have jurisdiction over this matter and/or Shao and Shao reserves the right to move to dismiss this matter due to lack of jurisdiction.

SECOND DEFENSE

The Court does not have jurisdiction over the subject matter of this suit and Shao reserves the right to move to dismiss this matter due to lack of jurisdiction.

THIRD DEFENSE

Plaintiff's claim is barred by applicable statutes of limitation.

FOURTH DEFENSE

Plaintiff's claim fails to state a claim upon which relief can be granted.

FIFTH DEFENSE

1. Plaintiff's claim is barred, in whole or in part, by the doctrine of unclean hands, res judicata and/or collateral estoppel or other principles of equity.

SIXTH DEFENSE

Plaintiff's claim is unenforceable because any alleged statements made by Shao are either not defamatory, or are true or substantially true, or are of such a nature that they cannot

be shown to be either true or false.

SEVENTH DEFENSE

Plaintiff's claim is unenforceable because any alleged statements made by Shao are matters of public concern, were made without actual or common law malice, and with a subjective belief in their truth.

EIGHTH DEFENSE

There is no basis in law or fact for Plaintiff's claim for punitive damages.

NINTH DEFENSE

Plaintiff's alleged damages were caused by the fault of a third party for which Shao has no responsibility and over which he has no control.

TENTH DEFENSE

Plaintiff's alleged damages were caused by his or her own fault.

ELEVENTH DEFENSE

Plaintiff's alleged damages were a direct result of his or her failure to take reasonable steps to mitigate alleged damages.

TWELFTH DEFENSE

Plaintiff's claim is barred in whole or part because the alleged negligence on the part of Shao, if any, was not the proximate cause of any injuries Plaintiff may have sustained or otherwise alleged in this action.

FOURTEENTH DEFENSE

Plaintiff's claim is barred in whole or part due to Plaintiff's failure to exhaust all administrative remedies available to him prior to filing this action.

FIFTEENTH DEFENSE

Plaintiff's claims were thoroughly investigated by his employer and, admittedly, unfounded.

SIXTEENTH DEFENSE

Plaintiff's claim is barred, in whole or in part, because Plaintiff has sustained no damages.

Shao reserves the right to raise additional defenses as may be discovered during the course of this litigation.

PRAYER FOR RELIEF

WHEREFORE, Defendant Shao denies that Plaintiff is entitled to any of the relief requested in his Prayer for Relief and demands judgment dismissing Plaintiff's claim in the above matter and Shao respectfully requests:

1. That Plaintiff takes nothing by this action;
2. That judgment be entered in favor of Shao and against Plaintiff on all causes of action;
3. That Shao be awarded his costs of suit herein incurred;
4. That Shao be awarded his attorneys' fees; and

5. Any other and further relief as the Court deems just and proper.

The Law Offices of
ROBERT D. KOVIC, L.L.C.

By: Robert D. Kovic
Robert D. Kovic, Esq.

Dated: April 18, 2025

JURY DEMAND

Shao hereby demands a trial by jury as to all issues.

The Law Offices of
ROBERT D. KOVIC, L.L.C.

By: Robert D. Kovic
Robert D. Kovic, Esq.

Dated: April 18, 2025

CERTIFICATION PURSUANT TO RULE 11.2

The undersigned hereby certifies that to the best of the undersigned's information, knowledge and belief, the within action is not presently the subject of any other action pending in any court or of a pending arbitration proceeding to date, nor is any other action or arbitration proceeding contemplated at this time.

The Law Offices of
ROBERT D. KOVIC, L.L.C.

By: Robert D. Kovic
Robert D. Kovic, Esq.

Dated: April 18, 2025